INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

February 12, 2003

Mr. Mark Erler
Erler Industries, Inc.
P.O. Box 219
North Vernon, IN 47265

Re: **079-16570**
Minor Source Modification to:
Part 70 Operating Permit No.: **T 079-7572-00010**

Dear Mr. Erler:

Erler Industries, Inc. was issued Part 70 Operating Permit **T 079-7572-00010** on September 23, 1998 for metal and plastic parts surface coating operations. An application to modify the source was received on December 9, 2002. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

Located in Plant 5 (125 West Hayden Pike, North Vernon, Indiana 47265)

One (1) paint line, consisting of three (3) spray booths, identified as EU22, EU23, and EU24, located in Plant 5, each equipped with high volume low pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting through Stacks SV-22, SV-23, and SV-24, respectively, capacity: 625 plastic parts per hour total.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

The source may begin construction when the minor source modification has been issued. Operating conditions shall be incorporated into the Part 70 Operating Permit as a minor permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter contact Michael S. Schaffer, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395, ext. 15 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Original signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments - changed pages of updated permit and TSD
MSS/MES
cc: File - Jennings County
Jennings County Health Department
Air Compliance Section Inspector - Joe Foyst
Compliance Branch - Karen Nowak
Administrative and Development - Lisa Lawrence
Technical Support and Modeling - Michele Boner

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PART 70 MINOR SOURCE MODIFICATION
OFFICE OF AIR QUALITY

Erler Industries, Inc.

418 Stockwell Street, North Vernon, Indiana 47265
71 Hayden Pike, North Vernon, Indiana 47265
and
125 West Hayden Pike, North Vernon, Indiana 47265

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Third Minor Source Modification No: MSM 079-16570-00010	Conditions Affected: A.2, A.3 , D.4.1 - D.4.3 and D.4.6, plus Quarterly Report Form for Section D.4 Conditions Added: D.5.1 - D.5.8, plus Quarterly Report Form for Section D.5 Sections Affected: D.4 and D.5
Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: February 12, 2003

Quarterly Report/Plant 1/Line 1
Quarterly Report/Plant 1/Line 2
Quarterly Report/Plant 2/Line A and Line B
Quarterly Report/Plant 3/Line 3
Quarterly Report/Plant 4/Line 4
Quarterly Report/One (1) Paint Line in Plant 5
Quarterly Compliance Report

(2) One (1) paint line, identified as Line B, with four (4) paint booths (each booth using HVLP guns, each booth using dry filters for particulate matter control, and each booth exhausting to their respective stacks, identified as S/V9, S/V10, S/V11, and S/V12): two (2) manual booths, identified as EU9 and EU10, and two (2) robot paint booths, identified as EU11 and EU12.

Line A and Line B each have a maximum capacity of 4.0 gallons/hour of conductive copper paint, a maximum capacity of 2.5 gallons/hour of conductive silver paint and a maximum capacity of 2.0 gallons/hour with conductive black paint.

Located in Plant 3 (125 West Hayden Pike, North Vernon, Indiana 47265)

One (1) paint line, identified as Plant 3, Line 3, with three (3) paint booths, identified as EU13, EU14, and EU15, with a maximum capacity of 437 plastic parts per hour total, equipped with HVLP spray guns and dry filters for particulate matter control, exhausting to S/V 13, SV14, and S/V15 respectively.

Located in Plant 4 (125 West Hayden Pike, North Vernon, Indiana 47265)

One (1) paint line, identified as Plant 4, Line 4, consisting of three (3) spray booths, identified as EU-19, EU-20, and EU-21, with a maximum capacity of 625 parts per hour total, equipped with HVLP spray equipment, controlled by fabric filters, exhausting through stacks identified as SV-19, SV-20, and SV-21.

Located in Plant 5 (125 West Hayden Pike, North Vernon, Indiana 47265)

One (1) paint line, consisting of three (3) spray booths, identified as EU22, EU23, and EU24, located in Plant 5, each equipped with high volume low pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting through Stacks SV-22, SV-23, and SV-24, respectively, capacity: 625 plastic parts per hour total.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary operation which spray paints plastic and metal parts that also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Four (4) curing ovens: two (2) 100,000 Btu/hr natural gas fired ovens located in Plant 1, identified as 6A, and 7A, exhausting to respective stacks identified as S/V 15 and S/V16; two (2) 1.0 mmBtu/hr ovens located in Plant 2, identified as 8B and 9B exhausting to their respective stacks identified as S/V13 and S/V14.

(b) Two (2) infra-red (IR) ovens, located in Plant 1, identified as 9A and 10A.

(c) Two (2) natural gas fired ovens located in Plant 3, identified as Oven-1 and Oven-2, exhausting to S/V3-1 and S/V3-2 respectively, rated at 1.2 mmBtu/hr, each.

(d) One (1) air make-up unit, located in Plant 3, identified as AM-1, rated at 6.0 mmBtu/hr.

(e) Two (2) infra-red (IR) ovens, located in Plant 3, identified as Oven-IR3 and Oven-IR4.

(f) Two (2) infra-red ovens, identified as Oven-IR7 and Oven-IR8, located in Plant 5.

(g) Two (2) ultraviolet ovens, identified as UV1 and UV2, located in Plant 5.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary operation which spray paints plastic and metal parts is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] - Plant 3, Line 3 and Plant 4, Line 4

Located in Plant 3

One (1) paint line, identified as Plant 3, Line 3, with three (3) paint booths, identified as EU13, EU14, and EU15, with a maximum capacity of 437 plastic parts per hour total, equipped with HVLP spray guns and dry filters for particulate matter control, exhausting to S/V 13, SV14, and S/V15 respectively.

Located in Plant 4

One (1) paint line, identified as Plant 4, Line 4, consisting of three (3) spray booths, identified as EU-19, EU-20, and EU-21, with a maximum capacity of 625 parts per hour total, equipped with HVLP spray equipment, controlled by fabric filters, exhausting through stacks identified as SV-19, SV-20, and SV-21.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 General Reduction Requirements for New Facilities [326 IAC 8-1-6]

The input VOC to Plant 3, Line 3 (EU13, EU14 and EU15) and Plant 4, Line 4 (EU-19, EU-20, and EU-21) each shall be limited to less than 25.0 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit makes 326 IAC 8-1-6 not applicable.

D.4.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to Administrative Amendment No. 079-11173-00010, issued on September 27, 1999, the PM from Plant 3, Line 3 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Pursuant to 326 IAC 6-3-2, the surface coating operations at Plant 3, Line 3, and Plant 4, Line 4, shall follow the following work practices and control technologies:

Dry filters shall be in operation at all times that EU-13, EU-14, EU-15, EU-19, EU-20, and EU-21 are in operation subject to the following:

(1) The source shall operate the control device in accordance with manufacturer's specifications.

(2) If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:

(A) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

(B) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the source shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that no overspray is visibly detectable at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the dry filters on Plant 3, Line 3 and Plant 4, Line 4.

Compliance Determination Requirements

D.4.4 Testing Requirements [326 IAC 2-7-6(1), (6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.4.5 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitations contained in Condition D.4.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.6 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when Plant 3, Line 3 and Plant 4, Line 4 are in operation.

D.4.7 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks, S/V13, S/V14, S/V15, SV-19, SV-20, and SV-21 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.8 Record Keeping Requirements [326 IAC 2-7-6]

(a) To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.4.1.

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: One (1) paint line in Plant 5

One (1) paint line, consisting of three (3) spray booths, identified as EU22, EU23, and EU24, located in Plant 5, each equipped with high volume low pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting through Stacks SV-22, SV-23, and SV-24, respectively, capacity: 625 plastic parts per hour total.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The amount of VOC delivered to the applicators of the one (1) paint line, consisting of three (3) spray booths (EU22, EU23, and EU24), located in Plant 5, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

D.5.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]

Any change or modification that increases the potential to emit of any single HAP from the one (1) paint line, located in Plant 5, to greater than ten (10) tons per year or increases the potential to emit of any combination of HAPs from the one (1) paint line, located in Plant 5, to greater than twenty-five (25) tons per year may render the requirements of 326 IAC 2-4.1-1 applicable and require prior IDEM, OAQ approval.

D.5.3 Particulate Matter (PM) [40 CFR 52, Subpart P]

Pursuant to 40 CFR 52, Subpart P, the PM from the three (3) paint booths (EU22, EU23, and EU24) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.5.4 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating, shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications. This requirement to operate the control is not federally enforceable.

D.5.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for one (1) paint line, consisting of three spray booths (EU22, EU23, and EU24), located in Plant 5, and any control devices.

Compliance Determination Requirements

D.5.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitation contained in Conditions D.5.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.5.7 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks SV-22, SV-23, and SV-24 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.8 Record Keeping Requirements

(a) To document compliance with Conditions D.5.1 and D.5.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and HAPs emission limit established in Conditions D.5.1 and D.5.2.

(1) The VOC and HAP content of each coating material and solvent used.

(2) The cleanup solvent usage for each month;

(3) The total VOC and HAP usage for each month; and

(4) The weight of VOCs and HAPs emitted for each compliance period.

(b) To document compliance with Condition D.5.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.5.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.5.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Erler Industries, Inc.
Source Address: 418 Stockwell Street, North Vernon, Indiana 47265
71 Hayden Pike, North Vernon, Indiana 47265
and 125 West Hayden Pike, North Vernon, Indiana 47265
Mailing Address: PO Box 219, North Vernon, Indiana 47265
Part 70 Permit No.: 079-7572-00010
Facility: Plant 4/Line 4 (EU19, EU20, EU21)
Parameter: VOC
Limit: Less than 25.0 tons per year

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Erler Industries, Inc.
Source Address: 418 Stockwell Street, North Vernon, Indiana 47265
71 Hayden Pike, North Vernon, Indiana 47265
and 125 West Hayden Pike, North Vernon, Indiana 47265
Mailing Address: P.O. Box 219, North Vernon, Indiana 47265
Part 70 Permit No.: T 079-7572-00010
Facility: One (1) paint line, consisting of three spray booths (EU22, EU23, and EU24), located in Plant 5
Parameter: The amount of VOC delivered to the applicators
Limit: Less than twenty-five (25) tons per twelve consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	The amount of VOC delivered to the applicators (tons)	The amount of VOC delivered to the applicators (tons)	The amount of VOC delivered to the applicators (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70
Minor Source and Minor Permit Modifications

Source Background and Description

Source Name:	**Erler Industries, Inc.**
Source Location:	**418 Stockwell Street, North Vernon, Indiana 47265, 71 Hayden Pike, North Vernon, Indiana 47265, and 125 West Hayden Pike, North Vernon, Indiana 47265**
County:	**Jennings**
SIC Code:	**3479, 3663**
Operation Permit No.:	**T 079-7572-00010**
Operation Permit Issuance Date:	**September 23,1998**
Minor Source Modification No.:	**MSM 079-16570-00010**
Minor Permit Modification No.:	**MPM 079-16961-00010**
Permit Reviewer:	**Michael S. Schaffer**

The Office of Air Quality (OAQ) has reviewed a modification application from Erler relating to the construction and operation of the following significant and insignificant activities and their respective pollution control devices:

Located in Plant 5 (125 West Hayden Pike, North Vernon, Indiana 47265)

(a) One (1) paint line, consisting of three (3) spray booths, identified as EU22, EU23, and EU24, located in Plant 5, each equipped with high volume low pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting through Stacks SV-22, SV-23, and SV-24, respectively, capacity: 625 plastic parts per hour total.

(b) Two (2) infrared ovens, identified as Oven-IR7 and Oven-IR8, located in Plant 5 (defined as an insignificant activity pursuant to 326 IAC 2-7-1(21)).

(c) Two (2) ultraviolet ovens, identified as UV1 and UV2, located in Plant 5 (defined as an insignificant activity pursuant to 326 IAC 2-7-1(21)).

History

On December 9, 2002, Erler Industries, Inc. submitted an application to the OAQ requesting to add an additional plant, identified as Plant 5, consisting of one (1) paint line, two (2) infrared ovens, and two (2) ultraviolet ovens to their existing source. Erler Industries, Inc. was issued a Part 70 permit T 079-7572-00010, on September 23, 1998, First Administrative Amendment AA 079-10589-00010, on August 20, 1999, First Significant Source Modification SSM 079-11008-00010, on September 27, 2000, Second Administrative Amendment AA 079-11173-00010, on September 27, 1999, Interim Construction Permit CP 079-12803I-00010, on October 25, 2000, First Minor Source Modification MSM 079-12803-00010, on December 15, 2002, First Minor Permit Modification MPM 079-12808-00010, on January 12, 2001, First Reopening R 079-13341-00010, on February 7, 2002,

Second Minor Source Modification MSM 079-16237-00010, on September 5, 2002, and Second Minor Permit Modification MPM 079-16437-00010 on October 16, 2002.

Note that the MSM 079-16237-00010, issued on September 5, 2002, and MPM 079-16437-00010, issued on October 16, 2002 has incorrectly addressed the location of Line 4.The location of Line 4 is Plant 4, thus, changes to the equipment list in conjunction with the addition of Plant 5 will be made as result of this Minor Source Modification and Minor Permit Modification.

Also note that each plant acts independently from the other plants to produce products at this source.

Source Definition

This plastic and metal coating company consists of five (5) plants:

(a) Plants 1 is located at 418 Stockwell Street, North Vernon, Indiana 47265;

(b) Plant 2 is located at 71 Hayden Pike, North Vernon, Indiana 47265; and

(c) Plants 3 and 4 and the proposed Plant 5 are located at 125 West Hayden Pike, North Vernon, Indiana 47265.

Since the five (5) plants are located on contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
SV-22	Spray Booth	27.0	2.42	15,000	70.0
SV-23	Spray Booth	27.0	2.42	15,000	70.0
SV-24	Spray Booth	27.0	2.42	15,000	70.0

Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on December 9, 2002. Additional information was received on December 30, 2002.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Pages 1 and 2 of 2 Appendix A of this document.

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA."

This table reflects the PTE of this modification before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	**Potential To Emit** (tons/year)
PM	7.08
PM_{10}	7.08
SO_2	-
VOC	35.59
CO	-
NO_X	-

HAPs	**Potential To Emit** (tons/year)
Xylene	6.26
MIBK	1.10
Ethyl benzene	1.56
TOTAL	8.92

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Minor Source Modification and a Minor Permit Modification. The Minor Source Modification is being performed pursuant to 326 IAC 2-7-10.5(d)(9), "a modification that has a potential to emit of greater than the thresholds under subdivision 4 that adds an emission unit or units of the same type that are already permitted and will comply with the same applicable requirements and permit terms and conditions as the existing unit or units, except if the modification would result in a potential to emit greater than the thresholds in 326 IAC 2-2 or 326 IAC 2-3" shall be considered a Minor Source Modification.

The paint line in Plant 4 and the proposed paint line in Plant 5 are the same type of emission unit. Furthermore, this source is maintaining their existing VOC PSD minor limit of 249 tons per year. Therefore, justification has been provided to perform this modification as a Part 70 Minor Source Modification pursuant to 326 IAC 2-7-10.5(d)(9)

The Part 70 Minor Permit Modification is being performed pursuant to 326 IAC 2-7-12(b)(1)(B) for modifications which "do not involve significant changes to existing monitoring, reporting, or record keeping requirements in the Part 70 permit".

County Attainment Status

The source is located in Jennings County.

Pollutant	Status
PM_{10}	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Jennings County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Jennings County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	0.156
PM_{10}	0.156
SO_2	0.009
VOC	249
CO	0.180
NO_X	1.23

(a) This existing source is not a major stationary source because no attainment regulated

pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories..

(b) These emissions are based upon Technical Support Document for Minor Source Modification No. 079-16273-00010, issued on September 5, 2002, and Minor Permit Modification No. 079-16437-00010, issued on October 16, 2002.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

	Potential to Emit (tons/year)						
Process/facility	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPs**
Plant 5 Paint Line consisting of three (3) spray booths (EU22, EU23, and EU24)	0.071	0.071	-	Less Than 25	-	-	Single Less Than 10 Total Less Than 25
Entire Source Limit	-	-	-	249	-	-	-
PSD Determination Level	250	250	250	250	250	250	

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply. This source is proposing to take a VOC limit of twenty-five (25) tons per year for the new surface coating line in order to render the requirements of 326 IAC 8-1-6 not applicable. Furthermore, this source will retain their existing entire source VOC limit of 249 tons per year. Therefore, this source will remain an existing minor PSD source.

Note that because Plant 5 will be operating independently of Plant 4, VOC emissions from Plant 5 will not be counted against the VOC limit in Plant 4.

Federal Rule Applicability

(a) This source is still not subject to the New Source Performance Standards (NSPS), 326 IAC 12, 40 CFR 60, Subpart TTT (Surface Coating of Plastic Parts for Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines). This source will surface coat plastic parts for the one (1) paint line, located in Plant 5, under Standard Industrial Classification (SIC) Code 3663. The 3663 SIC Code is not a category for the surface coating of plastic parts that covers business machines. Therefore, the requirements of 40 CFR 60, Subpart TTT are not applicable.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14, 326 IAC 20, 40 CFR 61 and 40 CFR Part 63) applicable to this modification.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD)

The potential to emit VOC from the entire source is still limited to less than 250 tons per year and the source is not 1 of the 28 listed source categories. Therefore, the requirements of 326 IAC 2-2 and 40 CFR 52.21 are not applicable.

326 IAC 2-4.1-1 (New Source Toxics Control)

The construction of the one (1) paint line, to be located in Plant 5, is for the purposes of producing new product. However, the unrestricted potential to emit of any single HAP from the one (1) paint line, to be located in Plant 5, is less than ten (10) tons per year and the unrestricted potential emit of any combination of HAPs from the one (1) paint line, to be located in Plant 5, is less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2.4.1-1 do not apply to the one (1) paint line, to be located in Plant 5.

Any change or modification that increase the potential to emit of any single HAP from the one (1) paint line, to be located in Plant 5, to greater than ten (10) tons per year, and the potential to emit of any combination of HAPs from the one (1) paint line, to be located in Plant 5, to greater than twenty-five (25) tons per year, may render the requirements of 326 IAC 2-4.1-1 applicable and will require prior IDEM OAQ approval.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR Part 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirements from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain applicable requirements until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

Pursuant to 40 CFR 52 Subpart P, the particulate matter (PM) from the three (3) spray booths (EU22, EU23, and EU24) in the paint line of the proposed Plant 5 shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Under the rule revision, particulate from the surface coating shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

326 IAC 8-1-6 (New facilities; General Reduction Requirements)

Because the surface coating of plastic parts is not covered any of the requirements of 326 IAC 8, the source has elected to take the following limitation to render the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) not applicable to the one (1) proposed paint line located in the Plant 5:

The VOC content delivered to the applicator of the one (1) paint line, consisting of three (3) spray booths (EU22, EU23, and EU24), located in Plant 5, will be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) will not apply.

Note that VOC usage in Plant 5 will not be counted against the existing VOC limit for Plant 4 because Plant 5 will be operating independently from Plant 4.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

The three (3) spray booths in the Plant 5 paint line has applicable compliance monitoring conditions as specified below:

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters for EU22, EU23, and EU24. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while the spray booths is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the spray booths stack exhausts, known as Stacks SV22, SV23, and SV24, for the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in bold):

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

Located in Plant 3 (125 West Hayden Pike, North Vernon, Indiana 47625)

~~(1)~~ One (1) paint line, identified as Plant 3, Line 3, with three (3) paint booths, identified as EU13, EU14, and EU15, with a maximum capacity of 437 plastic parts per hour total, equipped with HVLP spray guns and dry filters for particulate matter control, exhausting to S/V 13, SV14, and S/V15 respectively.

Located in Plant 4 (125 West Hayden Pike, North Vernon, Indiana 47625)

~~(2)~~ One (1) paint line, identified as Plant ~~3~~**4**, Line 4, consisting of three (3) spray booths, identified as EU-19, EU-20, and EU-21, with a maximum capacity of 625 parts per hour total, equipped with HVLP spray equipment, controlled by fabric filters, exhausting through stacks identified as SV-19, SV-20, and SV-21.

Located in Plant 5 (125 West Hayden Pike, North Vernon, Indiana 47625)

One (1) paint line, consisting of three (3) spray booths, identified as EU22, EU23, and EU24, located in Plant 5, each equipped with high volume low pressure (HVLP) spray

guns and dry filters to control particulate overspray, exhausting through Stacks SV-22, SV-23, and SV-24, respectively, capacity: 625 plastic parts per hour total.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

(f) Two (2) infra-red ovens, identified as Oven-IR7 and Oven-IR8, located in Plant 5.

(g) Two (2) ultraviolet ovens, identified as UV1 and UV2, located in Plant 5.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] - Plant 3, Line 3 and **Plant 4,** Line 4

Located in Plant 3

~~(1)~~ One (1) paint line, identified as Plant 3, Line 3, with three (3) paint booths, identified as EU13, EU14, and EU15, with a maximum capacity of 437 plastic parts per hour total, equipped with HVLP spray guns and dry filters for particulate matter control, exhausting to S/V 13, SV14, and S/V15 respectively.

Located in Plant 4

~~(2)~~ One (1) paint line, identified as Plant ~~3~~**4**, Line 4, consisting of three (3) spray booths, identified as EU-19, EU-20, and EU-21, with a maximum capacity of 625 parts per hour total, equipped with HVLP spray equipment, controlled by fabric filters, exhausting through stacks identified as SV-19, SV-20, and SV-21.

D.4.1 General Reduction Requirements for New Facilities [326 IAC 8-1-6]

The input VOC to Plant 3, Line 3 (EU13, EU14 and EU15) and Plant ~~3~~**4**, Line 4 (EU-19, EU-20, and EU-21) each shall be limited to less than 25.0 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit makes 326 IAC 8-1-6 not applicable.

D.4.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the surface coating operations at Plant 3, Line 3, and Plant ~~3~~**4**, Line 4, shall follow the following work practices and control technologies:

D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the dry filters on Plant 3, Line 3 and Plant ~~3~~**4**, Line 4.

D.4.6 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when Plant 3, Line 3 and Plant ~~3~~**4**, Line 4 are in operation.

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: One (1) paint line in Plant 5

One (1) paint line, consisting of three (3) spray booths, identified as EU22, EU23, and EU24, located in Plant 5, each equipped with high volume low pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting through Stacks SV-22, SV-23, and SV-24, respectively, capacity: 625 plastic parts per hour total.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The amount of VOC delivered to the applicators of the one (1) paint line, consisting of three (3) spray booths (EU22, EU23, and EU24), located in Plant 5, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

D.5.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]

Any change or modification that increases the potential to emit of any single HAP from the one (1) paint line, located in Plant 5, to greater than ten (10) tons per year or increases the potential to emit of any combination of HAPs from the one (1) paint line, located in Plant 5, to greater than twenty-five (25) tons per year may render the requirements of 326 IAC 2-4.1-1 applicable and require prior IDEM, OAQ approval.

D.5.3 Particulate Matter (PM) [40 CFR 52, Subpart P]

Pursuant to 40 CFR 52, Subpart P, the PM from the three (3) paint booths (EU22, EU23, and EU24) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10\ P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.5.4 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating, shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications. This requirement to operate the control is not federally enforceable.

D.5.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for one (1) paint line, consisting of three spray booths (EU22, EU23, and EU24), located in Plant 5, and any control devices.

Compliance Determination Requirements

D.5.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitation contained in Conditions D.5.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.5.7 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks SV-22, SV-23, and SV-24 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.8 Record Keeping Requirements

(a) To document compliance with Conditions D.5.1 and D.5.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and HAPs emission limit established in Conditions D.5.1 and D.5.2.

(1) The VOC and HAP content of each coating material and solvent used.

(2) The cleanup solvent usage for each month;

(3) The total VOC and HAP usage for each month; and

(4) The weight of VOCs and HAPs emitted for each compliance period.

(b) To document compliance with Condition D.5.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional

inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.5.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.5.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

NDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name:	Erler Industries, Inc.
Source Address:	418 Stockwell Street, North Vernon, Indiana 47265 ~~and~~ 71 Hayden Pike, North Vernon, Indiana 47265 **and 125 West Hayden Pike, North Vernon, Indiana 47265**
Mailing Address:	PO Box 219, North Vernon, Indiana 47265
Part 70 Permit No.:	079-7572-00010
Facility:	Plant ~~3~~ **4**/Line 4 (EU19, EU20, EU21)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Erler Industries, Inc.
Source Address: 418 Stockwell Street, North Vernon, Indiana 47265
71 Hayden Pike, North Vernon, Indiana 47265
and 125 West Hayden Pike, North Vernon, Indiana 47265
Mailing Address: P.O. Box 219, North Vernon, Indiana 47265
Part 70 Permit No.: T 079-7572-00010
Facility: One (1) paint line, consisting of three spray booths (EU22, EU23, and EU24), located in Plant 5
Parameter: The amount of VOC delivered to the applicators
Limit: Less than twenty-five (25) tons per twelve consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	The amount of VOC delivered to the applicators (tons)	The amount of VOC delivered to the applicators (tons)	The amount of VOC delivered to the applicators (tons)
	This Month	Previous 11 Months	12 Month Total

9 **No deviation occurred in this quarter.**

9 **Deviation/s occurred in this quarter.**
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Conclusion

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. MSM 079-16570-00010 and Part 70 Minor Permit Modification No. MPM 079-16961-00010.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Erler Industries, Inc.
Address City IN Zip: 418 Stockwell Street, North Vernon, Indiana 47265,
71 Hayden Pike, North Vernon, Indiana 47265, and
125 West Hayden Pike, North Vernon, Indiana 47265
Source Modification: MSM 079-16570
Permit Modification: MPM 079-16961
Plt ID: 079-00010
Reviewer: Michael S. Schaffer
Date: December 9, 2002

Three (3) Spray Booths (EU22, EU23, and E24)

Material	Plastic Parts Per Hour	Plastic Parts Per Gallon	Pounds of VOC per Gallon of Coating	Potential VOC Emissions in Pounds Per Hour	Potential VOC Emissions in Tons Per Year
Base Coat XPB2003	625	700	6.30	5.63	24.64
Clear Coat UV Gloss XPC70015	625	1000	4.00	2.50	10.95
				Total VOC Emissions:	**35.59**

METHODOLOGY

Potential VOC Emissions in Tons Per Year = Plastic Parts Per Hour x 1/ Plastic Parts Per Gallon x Pounds of VOC Per Gallon x 8760 hrs/yr x 1 ton/2000 lbs

Material	Plastic Parts Per Gallon	Plastic Parts Per Hour	Density in Pounds Per Gallon	Weight % Solids	Transfer Efficiency	Potential PM and PM10 Emissions in Pounds Per Hour	Potential PM and PM10 Emissions in Tons per year
Base Coat XPB2003	625	700	8.00	21.25%	60.00%	0.61	2.66
Clear Coat UV Gloss XPC70015	625	1000	8.04	50.22%	60.00%	1.01	4.42
	Dry Filters Control Efficiency		99.00%		**Total PM and PM10 Emissions Before Controls:**		**7.08**
					Total PM and PM10 Emissions After Controls:		**0.071**

METHODOLOGY

Potential PM and PM10 Emissions in Tons Per Year = Plastic Parts Per Hour x 1/ Plastic Parts Per Gallon x Density in Pounds Per Gallon x Weight % Solids x (1- Transfer Efficiency) x 8760 hrs/yr x 1 ton/200

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Erler Industries, Inc.
Address City IN Zip: 418 Stockwell Street, North Vernon, Indiana 47265, 71 Hayden Pike, North Vernon, Indiana 47265, and 125 West Hayden Pike, North Vernon, Indiana 47265
Source Modification: MSM 079-16570
Permit Modification: MPM 079-16961
Plt ID: 079-00010
Reviewer: Michael S. Schaffer
Date: December 9, 2002

Three (3) Spray Booths (EU22, EU23, and E24)

Material	Plastic Parts Per Hour	Plastic Parts Per Gallon	Density (lbs/gal)	Weight % Xylene	Weight % MIK	Weight % Ethylbenzene	Xylene Emissions	MIBK Emissions	Ethylbenzene Emissions
							(tons/yr)	(tons/yr)	(tons/yr)
Base Coat XPB2003	625	700	8.00	20.00%	0.00%	5.00%	6.26	0.00	1.56
Clear Coat UV Gloss XPC70015	625	1000	8.04	0.00%	5.00%	0.00%	0.00	1.10	0.00
							6.26	**1.10**	**1.56**
								Overall Total	**8.92**

METHODOLOGY

HAPs emission rate (tons/yr) = Plastic Parts Per Hour x 1/ Plastic Parts Per Gallon x Density (lbs/gal) x Weight % HAP x 8760 hrs/yr x 1 ton/2000 lbs